Krasner & Long, LLC Attorneys

Lawrence S. Krasner, Esq. Lloyd Long, III, Esq. Brian M. Collins, Esq. Elizabeth Hoffman, Esq.

Ronald Ervais, Esq., of counsel

The Tiger Building 1221 Locust St. Philadelphia, PA 19107

Tel. 215.731.9500 Fax 215.731.9908

July 9, 2014

The Honorable Paul S. Diamond Chambers United States Courthouse Suite 6613 601 Marked Street Philadelphia, PA 19106-1797

Advance courtesy copy sent via fax to 267.299.5069

FILED

Re:

McGill v. Liciardello, et al.

No. 12-5690

and related narcotics squad cases

JUL 1 0 2014

MICHAEL E. KUNZ, Clerk By ______Dep. Clerk

Dear Judge Diamond:

I hope this letter finds you well. In order to comply with your order of June 27, 2014, I have spoken with plaintiffs' counsel in the above-captioned matters concerning whether these cases should be taken out of suspense. Counsel for the plaintiffs were able to reach a consensus position that the stay on these matters should be lifted, but only for the limited purpose of plaintiffs pursuing "paper-only," i.e., non-deposition discovery on their Monell claims against the City of Philadelphia.

I have spoken with counsel for the City, Armando Brigandi, Esq., and for the individual defendants, Jeffrey Scott, Esq. about plaintiffs' position. Each has no objection to lifting the stay for this limited purpose so long as no depositions are taken and that discovery against the individual defendants remain stayed.

Additionally, as directed by this Court's order, I am notifying Richard Barrett, Esq., Chief of Official Corruption at the United States Attorney's Office in Philadelphia, of the parties' respective position on the limited lift of this stay by copy of this letter. I respectfully request that in the event that the Government wishes to take a position on this matter,

that it be made known to the court as soon as is feasible.

I appreciate the Court's consideration of this matter and the parties await its further direction. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

Lloyd Long III, Esq.

cc: Richard Barrett, Esq. (via hand delivery)

Armando Brigandi, Esq. (via email) Jeffrey Kolansky, Esq. (via email) Jeffrey Scott, Esq. (via email) Plaintiffs' Counsel (via email)

KRASNER & LONG, LLC

1221 LOCUST STREET PHILADELPHIA, PA 19107

T: 215.731.9500 F: 215.731.9908

Fax Cover Sheet

From:

Lloyd Long, III, Esq.

Contact No.:

215.731.9500

To:

The Honorable Paul S. Diamond, Esq.

Fax No.:

267.299.5069

Date:

July 9, 2014

Re:

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No. of pages:

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(incl. cover)

Additional Comments: